

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

D.T.E. 01-20 (Part A)

**Respondent:** Nancy Matt

**Title:** Manager – Service Costs

**REQUEST:** AT&T Communications of New England, Inc., Set #4

**DATED:** May 11, 2001

**ITEM:** ATT 4-30 Please provide any and all comparisons Verizon has made between SCIS total investment outputs and prices paid for actually purchased switches, either for Massachusetts or any other jurisdiction.

**REPLY:** Verizon MA has made no such comparison.

VZ #147

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-20 (Part A)**

**Respondent:** Nancy Matt

**Title:** Manager – Service Costs

**REQUEST:** AT&T Communications of New England, Inc., Set #4

**DATED:** May 11, 2001

**ITEM:** ATT 4-35 Please provide the year 2000 Lucent purchasing data used to develop the “overall effective discount” referred to at page 151 of Verizon’s direct panel testimony.

**REPLY:** Verizon MA considers the information to be proprietary and confidential and will provide the information subject to the terms of a mutually acceptable protective agreement.

A copy is being provided on a diskette only to AT&T and the Department.

Copies will be provided to other parties upon request.

This data includes three months worth of data for New Hampshire that was not used to develop the effective Lucent discount filed. Please see Verizon MA’s Panel Testimony, page 154, footnote 33.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-20 (Part A)**

**Respondent:** Nancy Matt

**Title:** Manager – Service Costs

**REQUEST:** AT&T Communications of New England, Inc., Set #4

**DATED:** May 11, 2001

**ITEM:** ATT 4-36 Please provide the year 2000 Nortel purchasing data referenced on page 152-153 of Verizon's direct panel testimony.

**REPLY:** Verizon MA considers the information to be proprietary and confidential and will provide the information subject to the terms of a mutually acceptable protective agreement.

VZ #153

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-20 (Part A)**

**Respondent:** Nancy Matt  
**Title:** Manager - Service Costs

**REQUEST:** AT&T Communications of New England, Inc., Set #4

**DATED:** May 11, 2001

**ITEM:** ATT 4-37 Please state what percent of the Lucent purchases reflected in “the Lucent actual purchase data” discussed at page 152 of Verizon’s direct panel testimony were associated with upgrade equipment.

**REPLY:** The actual purchase data from Lucent lists equipment types and prices, and does not specify which particular job each piece of equipment was purchased under, nor whether the equipment is associated with new, growth, or upgrade equipment. Verizon MA could not derive the requested level of detail without undertaking a burdensome special study.

VZ #154

